

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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DR. MILTON PRYSTOWSKY, in his own right
and as EXECUTOR OR THE ESTATE OF ROSE
PRYSTOWSKY,

Plaintiff,

v.

TGC STORES, INC., ADT SECURITY
SERVICES, INC., INVACARE CORPORATION,
GOLDEN BROTHERS, INC. d/b/a GOLDEN
TECHNOLOGIES, PRIDE MOBILITY
PRODUCTS CORP. and JOHN DOES 4 – 10

Defendants.

-----X
PRIDE MOBILITY PRODUCTS CORP.

Third-Party Plaintiff,

v.

DEWERT MOTORIZED SYSTEMS, PHOENIX
MECANO, INC. and KINGSTEC INDUSTRIES,
INC., and JOHN DOES 1 – 10

Third-Party Defendants.

-----X

**Civil Action No.
2:07-cv-00072-SDW-MCA**

**NOTICE OF MOTION FOR
28 U.S.C. §1292(b)
CERTIFICATION AND
STAY OF PROCEEDINGS**

PLEASE TAKE NOTICE that, on May 16, 2011, or as soon as counsel may be heard, defendant/third-party plaintiff Pride Mobility Products Corp. (“Pride”) shall move this Court before the Honorable Susan D. Wigenton at the United States District Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey 07101, for an Order certifying the March 23, 2011 Order and record for interlocutory appeal pursuant to 28 U.S.C. 1292(b) and

staying this action until resolution of that appeal.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Pride will rely upon the accompanying Memorandum of Law, and all exhibits thereto, and any additional submissions made hereafter.

PLEASE TAKE FURTHER NOTICE that a proposed Order is also submitted herewith.

Dated: April 15, 2011

**MIRANDA SAMBURSKY SLONE
SKLARIN VERVENIOTIS LLP**
Attorneys for Defendant
PRIDE MOBILITY PRODUCTS CORP.

s/ Neil L. Sambursky

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Our File No.: 09-018

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